## **REMARKS**

The Office Action of June 26, 2006 has been carefully considered. Reconsideration of this application, as amended, is respectfully requested. Claims 1, 3-6, 9-14, 16-18, and 21-26 are pending in this application. Of these, claims 1, 11, and 21 are independent claims.

This Amendment amends claims 1, 3-6, 9, 11-14, 16-18 and 21-24, cancels claims 2 and 8, and adds new claims 25 and 26 to more clearly set forth what is believed to be Applicant's invention. Support for these amendments is set forth in paragraphs 0156-0180 of Applicant's specification, with specific reference to paragraph 0165. No new matter is therefore believed to be introduced by these amendments.

## 1. Response to Rejection Under 35 USC 103(a)

The Office Action, beginning on page 4, rejects claims 1-6, 8-9, 11-14, 16-18, and 21-24 under 35 USC 103(a) as being unpatentable over Horowitz et al., U.S. Patent No. 6,122,647 (hereinafter referred to as **Horowitz '647**) in view of Horwitz et al., U.S. Patent No. 6,236,987 (hereinafter referred to as **Horowitz '987**), Mockus, "A Web-Based Approach to Interactive Visualization in Context" (hereinafter referred to as **Mockus**), and Reber et al., U.S. Patent No. 5,986,651 (hereinafter referred to as **Reber**). Further, the Office Action, beginning on page 11, rejects claim **10** under 35 USC 103(a) as being unpatentable over Horowitz '647 in view of Horowitz '987, Mockus, and Reber as applied to claim 1, and further in view of Keith Jr., U.S. Patent Application Publication 2002/0032672 (hereinafter referred to as Keith).

In response thereto Applicant amends independent claims 1, 11, and 21 to more clearly set forth what is believed to be Applicant's invention.

Horowitz '647 discloses a method for creating contextual hyperlinks in a source document, where the hyperlinks associate the source document with available target documents. The method includes selecting terms relevant to the user through linguistic analysis, from which relevant target documents are identified. A tagging module receives user selected portions of a document and selects terms to be used for establishing contextual links. A presentation module identifies topics in the knowledge base associated with the selected terms, and creates hyperlinks between the terms in the source document and target documents. (See Horowitz

## '647 Abstract.)

Horowitz '987 discloses an information retrieval system and method that dynamically organizes content retrieved in response to user input queries. The system operates on a document collection, in which each document is associated with one or more topics that have arbitrary semantic relationships with each other. In response to a query which may include topic terms, an initial set of documents is selected from the document collection. The documents in the initial set are organized by the topic arrangement, which organization may then be used to narrow or broaden the initial query. Four types of topic arrangements are possible – supertopics (has topics that are associated with all of the documents of the current document set), subtopics (has a selection of topics that provide the best coverage over the current document set), perspective topics (selects topics other than query topics), and theme topics (expresses a subject or a concept describing the document set). (See Horowitz '987 col. 2, line 65 to col. 7, line 34.)

Mockus discloses a framework for integrating and controlling information visualization components within a web page to create what is defined as a "live document" (see Mockus Abstract). Examples of visualization components include bar charts, histograms, and dynamic tables (see Mockus p. 181, column 2, lines 34-36 and page 183, section 4). Such visualization components reduce readers' learning time required for *interacting* with document views (see Mockus p. 181, column 2, lines 37-40). An example of user interactions with visualization components is a user's manipulation of a dynamic table initially displaying the top several drivers of a racing series such that the user is able to locate the two drivers who drove in only a few races yet won one race (see Mockus p. 184, column 2, lines 28-31).

Reber discloses a network navigation device which includes machinereadable data with an instruction for linking to a resource in an electronic network (see Reber Abstract). The machine readable data can include instructions which direct a network access apparatus to execute any combination of: a predetermined client routine (e.g., a predetermined Internet browser routine), a predetermined network provider access routine (e.g., a dialing and logging on to a predetermined service provider), and navigation instructions for automatically linking the network access apparatus to an electronic address via an electronic network (see Reber column 4, line 61 to column 5 line 2).

Keith discloses a method for performing a search of a database to generate matching items in the database, where a matching item representing a node within a directory tree structure is formatted into an encyclopedia-like entry (see Keith paragraph 0022, on page 3). More specifically, Keith describes coupling a notification module to a saved search module to notify users that desired information that has been added to a searchable database (see Keith paragraph 0083, on page 9). As an example, announcements related to a particular model of car are pushed by the notification module to car dealerships that would like to receive that information as it is added to the searchable database (see Keith paragraph 0095, on page 11).

In contrast, Applicant's claimed invention recited concerns a method for enriching document content. The method, which is described in Applicant's specification in paragraphs 0156-0180, includes recording with a reader a personality identifier, together with context information relating to when and where the personality identifier is recorded. Further, the claimed method provides that the personality identifier is associated with a personality in a database of personalities. In addition, the claimed method provides that document content identified using the recorded context information and metadata is enriched with the associated personality that defines a set of document service requests identifying enrichment themes.

More specifically, Applicant respectfully submits that Horowitz '987, Horowitz '647, Mockus, and/or Reber fail to disclose or suggest using recorded context information (both time and position) as recited in amended independent claim 1. As amended, claim 1 recites that document content is identified based on when and where (i) a personality identifier is recorded with the reader and (ii) document content is accessed with the reader. Once identified the document content together with the recorded personality identifier is transmitted from the reader to a metadocument server, where the personality identifier is associated with a personality that is used to enrich the identified document content using a set of document service requests identifying a document enrichment theme.

Instead, Mockus as set forth above discloses visualization components for

interacting with document views (e.g., to use visualization components to restrict the content of data in a table). Further as set forth above, Horowitz '987 discloses that results from queries may be organized by a topic arrangement. Thus neither Mockus nor Horowitz '987, taken singly or together recite as set forth in amended claim 1 identifying document content to be enriched based on when and where a personality identifier is recorded with a reader and document content is accessed with the reader. Instead Mockus discloses the use of visualization components and Horowitz '987 discloses the use of topic arrangements to restrict or arrange document content, neither of which restriction or arrangement arises from context data and meta data recorded with a reader as claimed by Applicant.

Accordingly, Applicant respectfully submits that Horowitz '987 taken singly or in combination with Horowitz '647, Mockus, and/or Reber fail to disclose or suggest using recorded context information as claimed by Applicant in independent claim 1. Insofar as independent claims 11 and 21 are concerned, these claims are believed to be allowable for those reasons set forth above with regard to claim 1 as these claims contain the same or very similar limitations to those discussed above with respect to claim 1. Insofar as claims 3-6, 9-10, 12-14, 16-18, and 22-26 are concerned, these claims depend from one of now presumably allowable independent claims 1, 11 and 21 and are also believed to be in allowable condition.

## 2. Conclusion

In view of the foregoing remarks, reconsideration of this application and allowance thereof are earnestly solicited. In the event the Examiner considers a personal contact advantageous to the disposition of this case, the Examiner is hereby requested to call Attorney for Applicant(s), Thomas Zell.

Respectfully submitted,

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